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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

NORMA TAPIA,

Plaintiff,

- against -

GC SERVICES LIMITED PARTNERSHIP;
CITIBANK

Defendants.

_____Civ. No. _____

NOTICE OF REMOVAL OF ACTION

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE, that pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, Defendant GC SERVICES, L.P. (“GCS”) hereby gives notice of the removal of this action from the Superior Court of the State of New Jersey, Law Division, Special Civil Part, Hudson County, New Jersey, where it is now pending, to the United States District Court for the District of New Jersey. In support of this Notice of Removal, Defendant GCS states:

1. On or about July 22, 2011, Plaintiff filed a summons and complaint in this action bearing docket number DC-016090-11 before the Superior Court of the State of New Jersey,

Law Division, Special Civil Part, Hudson County, New Jersey. A copy of the Summons and Complaint is annexed hereto as Exhibit A.

2. On or about August 3, 2011, GCS first received the Summons and Complaint by certified mail.

3. The Complaint alleges, in sum and substance, that GCS violated the Federal Fair Debt Collection Practices Act, 15 U.S.C. §1692, et seq., and the Federal Credit Reporting Act, 15 U.S.C. §1681, et seq. Accordingly, this action may be removed pursuant to 28 U.S.C. § 1441(b) as this Court has federal question jurisdiction under 18 U.S.C. § 1331.

4. To the extent Plaintiff purports to allege any state law causes of action, the Court has supplemental jurisdiction over the state law claims pursuant to 28 U.S.C. § 1367.

5. This Notice of Removal is timely filed within thirty (30) days after the named Defendant first received a copy of the initial pleadings setting forth the claims for relief and existence of federal question jurisdiction.

6. A civil cover sheet and the payment of the required filing fee accompanies this Notice.

7. Written notice of this Notice of Removal will be filed in the Superior Court of the State of New Jersey, Law Division, Special Civil Part, Hudson County.

WHEREFORE, Defendant GCS respectfully requests that this action be removed from the Superior Court of the State of New Jersey, Law Division, Special Civil Part, Hudson County to the United States District Court for the District of New Jersey.

Dated: New York, New York
August 30, 2011

HINSHAW & CULBERTSON LLP
Attorneys for Defendant
GC Services, L.P.

By: s/ Elizabeth K. Devine
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